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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ALEJANDRA ENRIQUEZ-ATUNEZ,

Defendant.

CASE NO. 2:21-CR-00169-CDS-BNW

**UNOPPOSED MOTION FOR TRAVEL
OUTSIDE THE DISTRICT OF NEVADA**

COMES NOW, Defendant, Alejandra Enriquez-Atunez, and hereby respectfully requests this Honorable Court issue an Order granting Defendant leave to travel outside the state of Nevada to Los Angeles, CA, on September 23, 2022 through September 25, 2022. Ms. Enriquez-Atunez will be traveling with her three daughters.

To date, Ms. Enriquez-Atunez has been compliant with all terms of her supervised release. Ms. Enriquez-Atunez has booked one night at the Hollywood Motel 6 (address has been provided to Pre-trial Services) where they will stay during the trip. Ms. Enriquez-Atunez is requesting permission to travel out of the jurisdiction with her three daughters for the two-day trip and will return to Las Vegas late the evening of September 24, 2022 (or the early hours of September 25, 2022 depending on the traffic conditions). All travel will be via vehicle.

1 The Defense has spoken to both Pre-Trial Services Officer Mariah Bassler-Wide and
2 AUSA Kimberly Sokolich regarding the request. AUSA Sokolich advised she would defer to Pre-
3 Trial Services and Officer Bassler-Wide has no objection to this request, so long as the
4 documentation for the address where they will be staying overnight was provided (documentation
5 of the hotel booking was provided to Officer Bassler-Wide). For these reasons, Ms. Enriquez-
6 Atunz respectfully requests the Court grant her Unopposed Motion for Travel from the period of
7 September 23, 2022 through September 25, 2022.
8

9 Dated this 21st day of September, 2022.
10
11

12 Respectfully submitted,
13

14 /s/ Jacqueline Tirinnanzi
15 JACQUELINE TIRINNANZI, ESQ
16 Nevada Bar No. 13206
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18 Henderson, NV 89012
19 Telephone: 702.463.9074
20 Attorney for Defendant
21 Alejandra Enriquez-Atunez

22 **ORDER**

23 **IT IS SO ORDERED**

24 **DATED:** 2:15 pm, September 22, 2022

25 

26 **BRENDA WEKSLER**
27 **UNITED STATES MAGISTRATE JUDGE**
28

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CERTIFICATE OF SERVICE

I certify that I am an Attorney of Counsel at KATHLEEN BLISS LAW PLLC and that
on this 21st day of September 2022, I did cause a true copy of:

UNOPPOSED MOTION FOR TRAVEL OUTSIDE THE DISTRICT OF NEVADA

To be served via electronic service by the U.S. District Court CM/ECF system to the parties on
the Electronic Filing system in this action.

By: /s/ Jacqueline Tirinnanzi
An Attorney of Counsel at
KATHLEEN BLISS LAW

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